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Serial No. 10/617,530

II. REMARKS

A.   Summary of the Response

Claims 1 to 30 were rejected in the Final Office Action of May 22, 2007.

Claims 1, 8, 16 and 23 are amended

Claims 4, 14, 22, and 29 are canceled

Claims 1-3; 5-13; 15-21; 23-28 and 30 remain pending

B.   Detailed Response

1.   Double Patenting – Copending SN 10/617,526.

Claims 1-30 are provisionally rejected on the ground of nonstatutory obviousness-type

double patenting as being unpatentable over claims 1-16, and 30-45 of copending Application

No. 10/617,526 in view of

http://web.archive.org/web/20001204034200/http://www.mandarintools.com/, Chinese-English

Dictionary link (hereinafter, "Mandarin Tools").

Response: As shown by the declarations and assignments on file in this and the co-

pending application 10/617,526, as well as by the signature of Applicant's attorney below, both

the present application and the co-pending application 10/617,526 are made by the same

inventive entity (Chen and Dunsemoir). The present application and the co-pending application

10/617,526 are also both owned by a common assignor (International Business Machines

Corporation). Even though the claims of application 10/617,526 have not issued, a provisional

terminal disclaimer is not believed to be required. Copending application 10/617,526 was filed

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on July 10, 2003, the *same date* as the filing date of the present application. Therefore, there is

no possibility of an extended term in this application.

2.   **Double Patenting – Copending SN 10/631,070**

Claims 1-3, 7-10, 14, 16-18, 22-25, and 29 are provisionally rejected on the ground of

nonstatutory obviousness-type double patenting as being unpatentable over claims 1, 5-7, 26,

and 30-32 of copending Application No. 10/631,070 in view of Mandarin Tools.

Response: As shown by the declarations and assignments on file in this and the co-

pending application 10/631,070, as well as by the signature of Applicant's attorney below, both

the present application and the co-pending application 10/631,070 are made by the same

inventive entity (Chen and Dunsemoir). The present application and the co-pending application

10/631,070 are also both owned by a common assignor (International Business Machines

Corporation). Even though the claims of application 10/631,070 have not issued, a provisional

terminal disclaimer is not believed to be required. Copending application 10/631,070 was filed

on July 31, 2003, *after* the July 10, 2003 filing date of the present application. Therefore, there

is no possibility of an extended term in this application. A Terminal Disclaimer has, however,

been filed in the co-pending application 10/631,070.

3.   **Claim Objections.**

The examiner objected to claims 7, 14, 22, and 29 under 37 CFR 1.75(c) as being of

improper dependent form for failing to further limit the subject matter of a previous claim.

Response: Applicant canceled claims 7, 14, 22, and 29 in response to this objection.

4.   **Obviousness Rejections 35 USC §103(a),**
        Claims 1-4, 6-11, 13-19, 21-26, and 28-30.

The examiner rejected claims 1-4, 6-11, 13-19, 21-26, and 28-30 under 35 U.S.C. 103(a)

as being unpatentable over Mandarin Tools in view of Chinese-English lookup,

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http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarm/cel/cel.htm

(hereinafter, "Lookup").

Response: "Mandarintools" and "Lookup" do not teach or suggest all of the elements of

any of Applicants' claims. It is well established that the Examiner has the burden of proof to

establish a *prima facie* case of obviousness under 35 U.S.C. §103(a). MPEP 2142 states:

> To establish a *prima facie* case of obviousness, three basic criteria must be met.
> First, there must be some suggestion or motivation, either in the references
> themselves or in the knowledge generally available to one of ordinary skill in the
> art, to modify the reference or to combine reference teachings. Second, there must
> be a reasonable expectation of success. Finally, **the prior art reference (or**
> **references when combined) must teach or suggest all the claim limitations.**
> The teaching or suggestion to make the claimed combination and the reasonable
> expectation of success must both be found in the prior art, and not based on
> applicant's disclosure. [Emphasis added]

The amended independent claims 1, 8, 16 and 23 each contain the following elements

highlighted below:

> 1.   (presently amended) A computer implemented method comprising:
> using a computer having a display and connected to the Internet, **copying**
> a Simplified Chinese character from a web page **by highlighting** the Simplified
> Chinese character on the web page;
> **pasting** the Simplified Chinese character **into an input field of a**
> **graphical user interface on the display**;
> recognizing the Simplified Chinese character without regard to an
> encoding format of the Simplified Chinese character;
> using Unicode to determine a Traditional Chinese character equivalent of
> the Simplified Chinese character;
> **simultaneously displaying** the Simplified Chinese character and
> the Traditional Chinese character equivalent **in the graphical user interface in**
> **response to an activation of a single control.**

Independent claim 8 is similar to claim 1 except that the copy and determine steps start with

Traditional Chinese characters and convert those characters using Unicode into Simplified

Chinese. In both claims, the Applicants' embodiments recognize the input character pasted into

a graphical user interface on the display and simultaneously display both forms of the Chinese

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character in the graphical user interface. Independent claims 16 and 23 are program product counterparts to claims 1 and 8.

The Applicants agree with the Examiner that Mandarintools contains a reference to a Chinese/English look up dictionary, but the Applicants' embodiments in this application do not convert between Chinese and English. Mandarintools also contains a link to a tool that purports to "convert web documents between GB, Big5, Unicode, etc." This web page converter works from a web page URL and converts the entire page into the desired output code.

Mandarintools does not teach or suggest the **copy and paste** of a Chinese character **into an input field of a graphic user display**. Mandarintools also fails to teach or suggest the **simultaneously display** both the Traditional and the Simplified form of a Chinese character in response to the **activation of a single control**.

The limited functionality of the Mandarintools dictionary is confirmed by the alternate TigerNT and G.Q. Shen "mirror sites" disclosed on page 1 of Mandarintools. These "mirror sites" make it clear that only one form of the Chinese word will be displayed at a time in response to a search request.

The web page converter of Mandarintools discussed above is similar. The output code is selected from a drop down menu, and only one output code may be displayed at a time. Multiple search queries and multiple copies of the web converter are required to separately display all forms of the Chinese text. "Lookup" is described in its documentation (included file CEL2DOC.txt) as follows:

> CEL detects text newly copied to the Windows Clipboard, and searches a Chinese-English dictionary for entries containing that text. Matching dictionary entries are displayed in CEL's window.
>
> You can highlight text in your Web browser or word processor, then copy it, and CEL will **find** the text on the **Clipboard**, search

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the dictionary and display the results. [line breaks removed, emphasis added]

Applicants' embodiments do not convert Chinese characters to English. The Applicants

may also copy a Chinese character to the Windows clipboard (if the Windows operating system

is in use), but that operation is only an intermediate step. The Applicants then **paste** the copied

character "into an input field of a graphical user interface on the display."

The Applicants disagree that Lookup will recognize a Chinese character "without regard

to an encoding format...." According to the Lookup documentation (CEL2DOC.TXT), multiple

copies of the programs must be installed in parallel directories to decode different versions of

Chinese (Big5 and GB are mentioned). Lookup does not use Unicode to decode multiple forms

of a Chinese word. Lookup's documentation describes its decoding function as fillows:

> CEL was originally designed to work with **Big5 text only. However,**
> **it seems to work fine with GB text too**, provided you use a GB
> version of the dictionary (CEDICT). I have not gotten around to
> checking the program logic to verify that it *always* works with
> GB text, but in practice it seems that it does. Note that the GB
> version of the dictionary needs to be renamed CEDICT.B5, as that
> is the only dictionary filename CEL will accept.
>
> **If you work with both GB and Big5 text**, you need to **install CEL in**
> **two parallel directories** (say C:\CELB5 and C:\CELGB). The files in
> each would be the same, except that in the CELGB directory the
> dictionary file CEDICT.B5 would be a GB version of CEDICT (in
> spite of its "B5" filename extension). Improvement in the handling
> of different encodings is on my list for future versions of CEL,
> so that this workaround won't be necessary. [line breaks removed,
> emphasis added]

The cited prior art, alone or in combination does not teach or suggest all of the elements

of Applicants' independent claims 1, 8, 16, and 23. The remaining claims of the application are

dependent on one of these independent claims and each contains all of the elements thereof..

5.   **Obviousness Rejections,**
      35 USC §103(a),
      Claims 5, 12, 20, and 27

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The examiner rejected claims 5, 12, 20, and 27 under 35 U.S.C. 103(a) as being unpatentable over Mandarin Tools in view of Lookup and in further view of Hughes ("1ICT3 Computer Science Sample Paper I, 1998, University of Dublin).

Response: All of these claims are dependent on the independent claims discussed above. They contain all of the elements of those independent claims and are allowable for the same reasons. Accordingly, dependent claims 5, 12, 20, and 27 are also in a condition for allowance.

III. CONCLUSION

Applicants respectfully submits that claims 1-3; 5-13; 15-21; 23-28 and 30 are all in a condition for allowance. In the event that the Examiner believes that additional rejections are in order, the Applicants respectfully request that the above amendments be entered in order to reduce the issues on appeal. If the Examiner has any questions or concerns regarding the present claims, the undersigned requests the scheduling of a telephone interview to discuss this case in greater depth. The Applicants counsel may be reached at the telephone number given below.

Respectfully Submitted,

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